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Attorney for Dora Plaintiffs

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION**

Ms. L, et al.,

Case No. 3:18-cv-428-DMS

Honorable Dana M. Sabraw

**JOINT MOTION SEEKING
COURT APPROVAL OF
PARTIES' STIPULATION
RELATED TO COSTS OF
MAILED NOTICE**

Plaintiff,

v.
U.S. Immigration and Customs
Enforcement, et al.,

Defendant.

Pursuant to Local Rule 7.2, the parties, through counsel of record, hereby file a Joint Motion respectfully requesting the Court to enter an order approving the parties' agreed-upon stipulation related to costs of mailed notice for the class action settlement approved by the Court on November 15, 2018. The parties stipulate and agree as follows:

RECITALS

WHEREAS, Defendants agree to pay for costs to provide notice to non-detained class members for an amount up to \$16,500.00.

WHEREAS, Plaintiffs will provide Defendants with a detailed accounting of

1 all costs. If Defendants believe that Plaintiffs are improvidently using the money
2 provided by Defendants, Defendants reserve the right to raise such concerns and any
3 related disputes to the Court for resolution.

4 WHEREAS, if Plaintiffs determine that they need more than \$16,500.00 to
5 provide notice to non-detained class members, Plaintiffs will notify Defendants and
6 will provide a detailed estimate of the additional amount requested, and the parties
7 will meet and confer regarding the request and, if the parties reach agreement, present
8 to the Court a joint proposed order to authorize the payment of further notice-related
9 costs. Should the parties fail to resolve the matter, the parties will present the dispute
10 to the Court for resolution.

11

12 Respectfully submitted,

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14

15 November 27, 2018

EVERSHEDES SUTHERLAND (US) LLP

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/s/ Wilson G. Barmeyer

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9 ADAM L. BRAVERMAN
10 United States Attorney
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct. Executed on ____, 2018.

/s/ Wilson G. Barmeyer
Wilson G. Barmeyer

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UNITED STATES DISTRICT COURT
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SOUTHERN DISTRICT OF CALIFORNIA
7
SAN DIEGO DIVISION
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10 Ms. L, et al.,
11 Plaintiff,
12 v.
13 U.S. Immigration and Customs
14 Enforcement, et al.,
15 Defendant.
16

Case No. 3:18-cv-428-DMS
Honorable Dana M. Sabraw
[PROPOSED] ORDER

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18 **[PROPOSED] ORDER**
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20 UPON CONSIDERATION of the Parties' Joint Motion Seeking Court
21 Approval of Parties' Stipulation Related to Costs of Mailed Notice, and review of the
22 record herein, it is it is, this _____ day of _____ 2018;

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24 **ORDERED**, that Defendants agree to pay for costs to provide notice to non-
25 detained class members for an amount up to \$16,500.00, and
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27 **ORDERED**, that Plaintiffs will provide Defendants with a detailed accounting
28

1 of all costs. If Defendants believe that Plaintiffs are improvidently using the money
2 provided by Defendants, Defendants reserve the right to raise such concerns and any
3 related disputes to the Court for resolution, and further,
4

5 **ORDERED**, that if Plaintiffs determine that they need more than \$16,500.00
6 to provide notice to non-detained class members, Plaintiffs will notify Defendants and
7 will provide a detailed estimate of the additional amount requested, and the parties
8 will meet and confer regarding the request and, if the parties reach agreement, present
9 to the Court a joint proposed order to authorize the payment of further notice-related
10 costs. Should the parties fail to resolve the matter, the parties will present the dispute
11 to the Court for resolution.
12

13 **SO ORDERED.**
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15 United States District Judge
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